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March 7, 2019

**VIA ECF**

The Honorable Nicholas G. Garaufis  
United States District Judge  
United States District Court  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write in response to the government's letter notifying the Court of what it asserts is a "potential conflict" with Teny Geragos' representation of Keith Raniere and Mark Geragos' representation of Clare Bronfman because they are "closely related." (Dkt. 390 at 1.) Counsel has made clear to both Raniere and the government that she is aware and takes seriously her ethical duties to her client—including the duties of confidentiality and loyalty. These duties have not and will not be impaired by her "close family relationship." (*Id.* at 2.) We do not believe there is a conflict; however, if the Court would like to conduct a Curcio hearing, we have provided Curcio counsel, Avraham C. Moskowitz, with the government's letter and are able to proceed with a hearing on the next court date, March 18, 2019.

Respectfully submitted,  
/s/  
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Marc Agnifilo  
Teny Geragos

cc: All Counsel (via ECF)